		ED STATES DISTRICT COUR TRICT OF MASSACHUSETT	
ANTHONY BAYAD ,	)		?005 OCT 19 ₽ 1:18
	)		OISTRICT OF MASS.
Plaintiff ,	)	CIVIL ACTION	
	)	CASE NO. 04-cv-10	468-PBS
JOHN CHAMBERS, PATRICIA	)		
RUSSO, ANTHONY	)		
SAVASTANO and CARL	)		
WIESE,	)		
Defendants,	)		
		HONORABLE DISTRICT JU	UDGE PATTI B. SARIS

NOTICE: SWORN INTERROGATORIES (QUESTIONS & ANSWER) OF PRO SE 'DOCTORS

CONSIDERED EXPERT TESTIMONY IN RESPECT OF SUCH CLAIM AS REQUIRED BY

FEDERAL RULES CIVIL PROCEDURES RULE 26 (a) (2)— MOTION TO ADMIT SUCH

EVIDENCE WHEN DISCOVERY AND DEPOSITION(S) WERE DENIED

## FEDERAL RULE OF CIVIL PROCEDURE 15(a)

Such Rule 15 (a) of Fed. R. Civ. P. I believe it declare that leave to amend shall be freely given when justice so required, and "denial" of motion without any apparent justifying reason was an abuse of discretion.

## GESTAPO TREATMENT CONDUCTED BY SAVASTANO & WIESE (CRUCIFIXION)

These defendants are hijacking white race only to exercise their hatred beliefs, a disease injected purposely against minorities in this wonderful country of ours the United States of America, the land of the Brave and the Free and the land of Justice and opportunities for all its white and black citizens, and

such defendants crucified (me) Pro Se Bayad using Gestapo style torture (Hate Race Crime) twice. Lucent Technologies Tampa Florida where the law was bought, and now Cisco Systems on going litigation, and such hate crime has brought Trauma-Posttraumatic Stress Disorder upon Plaintiff Pro Se Bayad, when they imprisoned him alone in a room with lucent corporate Police Renold Laurino acting under the direction of Defendant Anthony Savastano and Carl Wiese, who proceeded with mental torture and accused Mr. Bayad of stealing from Lucent Technologies Inc. by charging items on his American Express Card under his name and his Social Security and under his responsibilities, and such conduct it was common conduct by every white people of Lucent Managers including Defendant Carl Wiese and his cousin Mike Reed who purchased personnel Golf Club(s) and purchased Plan ticket for his girlFriends. Exhibit I attached to the complain of Defendant Carl Wiese and Mike Reed of Lucent Amex Credit card, and Since Defendant Savastano's title was the Director of Lucent Finance and accounting, conspired by initiating such illegal conduct of accusing Mr. Bayad of finance fraud (stealing from the company), it is outrageously when among 40, 000.00 employees Defendant Savastano only notice Pro Se Bayad purchases of his Amex Credit Cards and it Shows that Savastano was supervising as he had a complete access to Mr. Bayad 's lucent personal financial records. Exhibit J Moreover Defendant Anthony Savastano was an accountant during his entire career and a attached. financial analyst with Wang Laboratory, Lucent Technologies, and now Cisco Systems Inc. Defendant Savastano was the lead conspirator and the expert in Finance and accounting. It was conspicuous of him to accuses Mr. Bayad of financial fraud and stealing from Lucent technologies Inc., It was a **dumb pretext** to **finish him up once** and **for all**, Brightly Mr. Bayad was a hard working, very educated, and very technically competent in field of internetworking. The fact are indisputable about Mr. Bayad's conduct. He is a Tax Payer, as well as a responsible citizen during his entire life, and without any criminal behavior, or any mental history as he was framed by Defendants and was

committed involuntarily to the psychiatric award against his will. Mr. Bayad has never considered filing chapter 7 or any other credit discharge even when he was destroyed then and now financially by Defendants. After being screamed at, abusively interrogated, intimidated, physically assaulted, and confined alone in a room with Lucent Corporate Police, Mr. Bayad became extremely scared and afraid for his safety. Mr. Bayad advised Lucent Corporate Police that this action taken against him was not right, and if he could leave the room or could call his attorney, or if someone else could be admitted to the room so that his personnel safety could be assured. Lucent Corporate Police refused Mr. Bayad's demand and kept Mr. Bayad falsely imprisoned and proceeded to scare, Harass, intimidate him as he has been instructed by Defendants. Lucent corporate police Renold Laurino continuously made derogatory remarks about Mr. Bayad's ethnic, racial background as Arab, and about Mr. Bayad's ability to speak English. While falsely imprisoned at the hand of lucent corporate police acting under the direction of Defendants Anthony Savastano. He stated things like: "I don't know what's wrong with company (Lucent) hiring people like you. "And "ten year ago I wouldn't even be talking to someone like you." (Meaning Arabs) Such remarks were directed specially at Mr. Bayad's Arab race and ethnic background, and the fact he had been born in Africa and was considered foreigner under the eyes of Defendants. After being falsely imprisoned and abusively interrogated by Lucent Corporate police for such intense period of time, Mr. Bayad became sick with fear and tried to leave the room. When Mr. Bayad reached the door, several Lucent Technologies including corporate Police, security and Defendant Anthony Savastano attempted to physically restrain him and kept him locked in the room where he was being falsely imprisoned. In the scuffle that ensued, Mr. Bayad was dragged or thrown down a flight of stairs and ended up submerged head first in a fountain on the floor below. As result of the scuffle, Mr. Bayad received injuries to his head and neck and his clothes were torn. Dkt.1 Exhibit K attached of the Pinellas County Sheriff's office incident/Offense report. An ambulance was called

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to take Mr. Bayad to the hospital, while he was lying in the ambulance with an I.V in his arm and being treated by paramedics, Mr. Bayad was terminated from Lucent at the presence of Defendant Anthony Savastano who was on the phone with Carl Wiese and Patricia Russo. Mr. Bayad was charged of trespassing even though he was asked to come to Largo (Tampa Florida) office at their request and Mr. Bayad was an employee of Lucent Technologies Inc. While lying in the ambulance and with an I.V. in his arm, Mr. Bayad was forced through the humiliation of having to give back his business addresses, his pager was wet and not operational, and his corporate American Express cards despite the fact the card had already been deactivated and could no longer be used by anyone Dkt.1 Exhibit L attached of the Fire Department's report at the scene during the 911 call. Deliberately and without a doubt Mr. Bayad was intentionally humiliated, tortured and degraded at the hand of these depraved Defendants, and it was executed and carried out by Defendants Anthony Savastano, Carl Wiese, and Patricia Russo. They reposed about the occurrence of the incident and conspire against Mr. Bayad, and were the ones who called to the Police and Fire Rescue to the Scene, and also provided defamatory occurrences the police, and to convinced them to commit Mr. Bayad to the psychiatric ward against his will (in Florida they call it "Backer Act"). At the scene, Defendant Savastano 'girlfriend Joan Grohe was heard to Exclaim, "I warned", and "I told them (Defendants) not to do it. They fucked it up." Ms. Grohe also knew that Mr. Bayad was going to be Baker Acted (or committed to the psychiatric ward against his will) before the ambulance had even left the parking lot of the Lucent Largo office and remarked to a coworkers that "we're going to baker Act him." Mr. Bayad was obeyed to spent a 72 hours in the psychiatric ward, and since he has recognized not having any problem, the Sun cost Mental Hospital's Doctors released him very shortly.(It was the most grim moments of his life)Since all Lucent employees had used their Credit Cards the same fashion as Mr. Bayad. At least Mr. Bayad asked for permission before using his credit cards and paid it back. It was obvious in the eyes of Defendants, Mr.

Bayad is considered without a doubt a second class Citizen and without the right of due process. When Mr. Bayad was released from the hospital, and he was left by defendants without any money, clothes, or means of transport ting him self to his home, it was an obvious conduct of hate and disgrace by the Defendants.

## EMOTIONAL OR PSYCHOLOGICAL TRAUMA

Trauma, the word brings to mind the effects of such major events as War, Rape, Kidnapping, Abuse, Torture, or other similar assault and discrimination. The emotional aftermath of such event as it was done to Plaintiff Bayad at Lucent Technologies Tampa Florida and such Gestapo torture was purposely brought flash back to Pro Se Bayad at Cisco Systems Massachusetts and to present time, such Gestapo Treatment is recognized by the medical communities and by such expert mentioned in the above caption matter the Plaintiff Pro Se ' Doctor(s), Dr. Barbara Serko, Dr. James C. Eutzler, Dr. John Carrol, and Dr. Myles Keroak of Massachusetts General Hospital, stating in it under oath testimonial(s) absent of discovery herein, is known as Post-Traumatic Stress Disorder ("PTSD") or emotional or Psychological Trauma. It is not the even that determine whether something is traumatic to someone, but the individual a Pro Se Bayad 'experience of the event (Lucent and Cisco); and it is not predictable how a given person will react to a particular event, and for someone as Pro Se Bayad who used to being in control of his emotions and events, such event of Gestapo treatment of torture at Lucent Technologies and now at Cisco by Defendants, such illegal Gestapo torture was done surprisingly and executed upon Pro Se Bayad in a manner unexpected, such event was surprisingly and shocking -even embarrassing - to discover that something can happen in United States of America, that something like that can happen to an Employee at will and knowingly he could be fired at any time, that something like this can happen without justice could be served, and to discover that something like this can be debilitating, By only two racist persons Savastano from Calabria's Italy ( Communist Mussolini from the Mountain) and Carl Wiese from

Eastern Europe (Communist General Francesco Poland), hijacking white race and using the resources of a Corporate America Lucent Technologies and now Cisco to exercise their Sick Believe of racism in United States Soil upon American(s) as Pro Se Bayad and resident of the Commonwealth of Massachusetts, they engaged in concert effort to harass and discredit, Fostering a hostile environment at Lucent Technologies Florida and now Cisco Massachusetts, by locking him in a room against his will, screaming at him as dirty Arab and Sang Niger, hitting him and forcing him to sign Corporate Papers to frame him, falsifying accusation to arrest him, terminating him to intentionally to inflict emotional distress while in the ambulance on the way to the hospital from the Gestapo torture executed upon him in close door, dumping him in corporate fountain to show their power, by ordering, arranging, encouraging, and offering favors to the Police Officers in exchange to confine Pro Se Bayad in Psychiatric ward against his will, and to take his wallet and his credit card without means of transportation back to his home 500 mile way, and by swearing out trespassing complaint against him while he was hospitalized after he had been specifically ordered to come to meeting with such Defendants, who commanded and have intentionally alternatively negligence inflicting emotional distress using the Gestapo Style torture (see Dkt.1). THEREFORE ANTHONY BAYAD PLAINTIFF PRO SE INTRODUCE IN THE I, FORGOING ABOVE CAPTION MATTER A TUE COPIES OF EVIDENCE(S) ABSENT OF DISCOVERY OR DEPOSITION(S) OR ANY SUBPOENAS(S) OR ANY OTHER MEANS THAT HAS PREJUDICE ME IN THIS FORGOING ABOVE ACTION MATTER, declare pursuant to 28 U.S. § 1746 SEE ATTACHED DOCUMENT(S):

a. Exhibit 9 attached hereto is evidence from Massachusetts General Hospital Radiology Diagnostic requisition sharing with the Court the complication of Plaintiff Pro Se Bayad ' health and the constant chest pain and short of Breath and stomach pain of all the different drug prescription consumed medicine taken.

- b. Exhibit 10 ttached hereto is sworn testimonial from Plaintiff Bayad treating Doctor Barbara Serko considered medical expert in regard to the disparate treatment and the Gestapo treatment torture executed upon Plaintiff Bayad during his employment with Defendants.
- of Doctor James C. Eutzler that treated Plaintiff Bayad when he was framed and detained against his will in Prison called the Confined Hospital under an Act of Baker Act that Defendants has used against Bayad during their employment with him.

Anthony Bayad 2 MAGOUN AVENUE MEDFORD, MA 02155 TEL: (781 704-8982

Anthony Bayad

## CERTIFICATE OF SERVICE

It is hereby Certify that a true and correct copy of the Forgoing motion in the above caption matter in Chambers et, al,, was furnished via U.S mail to: Mr. Bruce E. Falby, BBO # 544143, DLA Piper Rudnick Gray Carry, One International Place, Boston MA 02110, this day of October, 2005

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